

**TECHNICAL SUMMARY
ADMINISTRATIVE AMENDMENT
Radioactive Material License No. R05807
Amendment No. 09**

Description of Application

Applicant: Waste Control Specialists LLC (WCS)
Radioactive Material License (RML) No. R05807
Customer Number: CN600616890
Regulated Entity Number: RN101702439

Action: Administrative Amendment of RML No. R05807 for by-product material disposal.

Location: WCS is located at 9998 State Highway 176 West, Andrews, Andrews County, Texas 79714, near the Texas-New Mexico state line.

General: WCS currently holds a radioactive material license for a by-product disposal facility which only authorizes the disposal of Fernald containerized by-product material, formerly stored in Silos 1 and 2 of the Fernald Waste Management Plant.

Request: WCS submitted an original administrative amendment application to the TCEQ on October 14, 2014 to update and modify the license conditions that are obsolete, represent improvements or that reflect minor changes appropriate to continuing monitoring and maintenance of the facility.

Authority: A TCEQ radioactive material license for the receipt and disposal of by-product material is required. An amended license has been prepared in accordance with the applicable requirements of Title 30, Texas Administrative (TAC) Chapters 281, 305 and 336.

Administrative Information

At the time of this review, WCS did not have any delinquent fees.

The regulated entity, WCS, has a compliance history classification of satisfactory, with a rating of 0.34.

The WCS site has a compliance history classification of satisfactory, with a rating of 0.34.

Technical Information

This license amendment has been reviewed in accordance with applicable rules and statutes, including 30 TAC Chapter 336 (Radioactive Substance Rule) and Chapter 401 of the Texas Health and Safety Code. The review of the request included an assessment

of the radiological and non-radiological effects of the license changes on the public health and safety.

The following license conditions (LCs) were deleted (replaced with reserved) since they contain requirements — either pre-operational, specific for disposal of the Fernald Silo Waste, or other — which have since been accomplished: 34, 46.B, 54, 57.B, 60.D, 91.A, 91.B, 94, 97.A, and 98. LCs 36 and 46.A were modified to remove obsolete text that contains pre-operational requirements.

LC 12.G was removed so that the same qualifications and training that is provided to the radiation safety technicians (RST) does not need to be provided to all other positions at the By-Product Material Disposal Facility since employees other than RSTs do not need to have RST training.

LC 37.B was modified to change the frequency of inspection for holding tanks from daily to monthly for inspecting the tank exterior, weekly to monthly for checking the grounding wire for damage, every two years to every five years for checking the tank wall thickness and integrity, and from every five years to prior to end of tank bottom corrosion life or 10 years for the visual internal inspection. Additional requirements for the visual internal inspection were added which include that 1) the inspection comply with the United States Environmental Protection Agency (EPA) Spill Prevention, Control, and Countermeasures requirements in Title 40 Code of Federal Regulations (CFR) Part 112, inspection standards provided by the American Petroleum Institute Standard 653, and inspection standards provided by the Steel Tank Institute; 2) if the corrosion rates are not known and similar service experience is not available to estimate the bottom plate minimum thickness at the next inspection, the internal inspection interval shall not exceed 10 years, and 3) in no case shall the inspection frequency exceed 20 years. These changes were made to update the inspection regime for the tanks to more reasonably comport with both regulatory guidance and industry standards.

LC 53 was modified to change the requirement from following all applicable procedures as provided in the application to following TCEQ approved procedures to authorize WCS to use procedures that have been revised and approved by TCEQ since the application.

LCs 55.B, 56.B, 61, 63, and 92.E were modified to update the procedures used from by-product facility specific to site-wide procedures that have been approved by TCEQ. LC 92.E was also modified to correct an error.

LC 57.C(1) was modified to clarify that the location of where employees store their dosimeters does not need to be where personnel exit the restricted area.

LC 70 was modified to require the Licensee to monitor for radon in accordance with procedure RS-3.3.1 and remove the requirement to submit procedures and monitoring locations for radon monitoring since the Licensee has submitted these procedures and monitoring locations.

LC 72.F was modified to change the location of where postings are to be placed for the security fence from "five to six feet" to "four to six feet" to accommodate the height and positioning of the postings.

LC 78 was modified to remove the requirement that the Licensee provide a quarterly report on any planned changes since this report is not needed due to the constant communications between WCS and TCEQ.

LC 79.C was modified to change the definition of personnel contamination from being any reading above background to any reading that surpasses the values in 30 TAC §336.364, Appendix G. Additionally, the LC was modified to add the requirement that the Licensee shall perform additional monitoring in accordance with procedures RS-3.6.1 and RS-3.6.2 in case of personnel contamination. These modifications were to update the LC to regulatory and industry standards. Consequently, LC 86.C was removed since it is now duplicative of LC 79.C.

LC 79.D was removed since these requirements are basic requirements of any radiological protection program and are firmly institutionalized in the WCS Radiation Safety Program with the survey requirements established in procedure RS-3.6.1 and RS-3.6.2.

LC 83 was modified by changing the calibration of the air samplers from six months to "twelve months or a shorter period if recommended by the manufacturer" to match the industry standard.

LC 86.A was modified to change the requirement from alpha contamination surveys to contamination surveys since WCS conducts these surveys for alpha, beta, and gamma contamination.

LC 86.D was modified to change the unannounced audit of each alpha survey location from monthly to annually since no disposal activities are ongoing and the Fernald waste is sufficiently containerized so that no alpha contamination will be released. Additional text was added that stated that if waste is being accepted for disposal, then the frequency shall be monthly. After waste has been disposed and no new waste is being accepted for disposal, the frequency shall be quarterly if no alpha contamination has been found in three months; and the frequency shall be annually if no alpha contamination has been found in three quarters.

Additionally, the license was reformatted to make it accessible, which required adding a title to LCs 9, 13, and 30.